

Advocates for the Rights of Individuals

October 20, 2013

Via CM/ECF

Honorable Magistrate Judge Franklin L. Noel
U.S. Courthouse, Suite 9W
300 South Fourth Street
Minneapolis, MN 55414

Re: Request for leave to file

Dear Magistrate Judge Noel:

I have reviewed Mr. Godfread's letter and respond as follows:

First, if Mr. Godfread wants relief from the Court, then he is obligated to follow the procedures for motion practice set forth in the Local Rules. He is also obligated to file his requests on the record. His request is *ex parte* with respect to the public, which has a right of access to the federal courts;

Second, the documents Mr. Godfread proposes to file are inadmissible because they are not authenticated. Mr. Godfread claims that the exhibits "appear" to be financial records of Prenda Law, Inc. Perhaps he is right, but I have not reviewed Prenda Law's financials and neither, presumably, has he. Until he can authenticate the documents, they are inadmissible;

Third, the documents undermine Mr. Godfread's narrative. I have consistently stated—often to deaf ears—that I sold my law practice to Prenda Law in late-2011 and subsequently pursued other interests. That is what these documents show. I am labeled an "old owner" throughout the documents. With one *de minimis* exception, the only transfers I received from Prenda Law were in consideration of the sale of my practice;

Fourth, the documents have no relevance to the subject-matter of this case, which was filed as an action for copyright infringement. Although it has since morphed into a different matter, the day-to-day ledgers of a law firm are not relevant to either inquiry; and

Fifth, if these documents are authentic, then they were stolen. No business would release sensitive financial documents to its adversaries. I understand that this matter is being investigated and will be reported to law enforcement, as appropriate.

/s Paul Hansmeier